

## CITY OF MORGAN CITY LANGUAGE ACCESS PLAN

### I. PURPOSE

The purpose of this policy is to establish policies and procedures for providing information about City of Morgan City (“City”) services, programs, and activities to residents and visitors with Limited English Language Proficiency (LEP), consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166.

### II. SCOPE

This policy applies to all City departments, employees, and elected officials.

### III. DEFINITIONS

- A. *Bilingual or Multilingual Employee*: An employee compensated and recognized by the City for being functionally competent in two or more languages.
- B. *Essential Public Information*: Any information developed or used by the City and deemed vital to accomplish the City’s mission and for purposes of public safety, public health, and public welfare.
- C. *Limited English Proficient (LEP) Individuals*: Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing).
- D. *Interpretation*: The act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.
- E. *Interpreter*: A person who is bilingual or multilingual and can successfully convey a message from one language to another through oral communication.
- F. *Language Access Plan (LAP)*: City-specific documents outlining the procedures and practices that the City will implement to provide language access services to LEP individuals.
- G. *Translation*: The written communication of meaning from one language (the source language) to another (the target language).

H. *Translator*: A person who is bilingual or multilingual and possesses the ability to translate from one language to another in written form.

#### IV. RESPONSIBILITIES

All city department heads, supervisors, and administration have been notified that they are fully obligated to ensure meaningful access to all programs and activities offered by the City of Morgan City.

The city shall:

- Ensure identification and securing of existing and needed resources to provide oral and written language services.
- Identify language for initial translation based on demographic data.
- Create systems to distribute translated documents.
- Identify training needs of staff needing to use language services, as well as language service providers on staff.
- Establish protocols for ensuring quality, timeliness, cost-effectiveness, and appropriate levels of confidentiality in translations, interpretations, and bilingual staff communications.
- Identify and implement a system for receiving and responding to complaints.
- Review the progress of the City of Morgan City on an annual basis in providing meaningful access to LEP persons, develop reports, and recommend modification to LEP Guidelines as appropriate.

#### V. POLICY

It is the policy of the City of Morgan City to assure full and affirmative compliance with Title VI of the Civil Rights Act of 1964, as amended, and related statutes and implementing authority. The City of Morgan City will take reasonable steps to ensure meaningful access to the agency's programs, activities, services, and information that are normally provided in English are accessible to LEP persons.

- A. **Implementation.** The city administration and Personnel Officer are responsible for monitoring programs and activities to ensure meaningful access for LEP

persons. All departments are to inform their employees of their obligation to provide meaningful access to information and services to LEP persons.

- B. Compliance with Federal Law.** Title VI - Section 601 of the Civil Rights Act of 1964. No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Executive Order 13166 of the Civil Rights Act of 1964. Federal agencies and recipients of federal financial assistance must take reasonable steps to ensure meaningful access to their programs to limited English-proficient individuals who are five (5) percent of the total population or 1000 individuals, whichever is less.

- C. Training.** The City of Morgan City department heads and elected officials are required to understand, direct staff to comply, and must implement the Language Access Policy, plan, and procedures. All employees must be informed of their obligations to provide meaningful access to information and services for LEP individuals. The Personnel Officer is also available to assist with information and training requests. Department heads are to provide all employees with the Language Access Policy and inform them of the procedures and services available.

- D. Dissemination of Policy.** The City of Morgan City's Language Access Policy, plan, and procedures will be posted on the City's website, included in the City of Morgan City Employee Work Plan, and distributed to all city departments upon adoption. Copies of the policy will be provided, on request, to any person(s) requesting the document via phone, in-person, by mail or email. Requests should be directed to the Personnel Officer.

Personnel Officer  
City of Morgan City  
P.O. Box 1218  
Morgan City, LA 70381  
Phone: (985)385-1770

- E. Monitoring and Updating.** The City shall conduct an audit of language assistance services on an annual basis. The audit consists of monitoring, evaluating, and updating the Language Access Policy, plan, and procedures as needed.

## VI. CITY-WIDE LANGUAGE ACCESS PROCEDURE FOR LEP INDIVIDUALS

This procedure should be applied when assisting LEP individuals, whether in person or by telephone and may be adjusted given the circumstances.

A. **Identification.** City employees should identify the language and communication needs of the LEP individual. If necessary, employees may use a language identification card, iSpeak cards, or posters to determine the language. Departments will maintain readily accessible iSpeak cards or language identification cards.

**B. Interpreters.**

a. **Departmental.** City employees should first use their in-house staff, if available, to interpret. Departments shall maintain a list of bilingual, or multilingual employees that includes the language(s) they speak, and their phone number. This list shall be made readily available to all departmental employees.

b. **Friends/Family.** LEP individuals who prefer to use a family member, or friend as an interpreter, may do so if they request it. For official proceedings, a certified interpreter may be required.

C. **Providing Notice to Persons with LEP.** The City must take reasonable steps to inform LEP individuals and stakeholders about the availability of LEP services and the complaint process. Employees will let LEP individuals know they have a right to language services at no charge to the resident requesting assistance. Language assistance notices will be provided by:

- a. Displaying flyers or posters in appropriate City reception areas and other facility entry points.
- b. Standard translated notice in City outreach documents for public meetings.
- c. Working with community organizations and stakeholders to inform Morgan City residents of their right to language access services.

D. **Translation of Vital Documents.** The City will provide translation of vital documents and emergency communications, as determined at the discretion of the department. The City will make its best effort to ensure timely access to interpretation and translation services. The City will distribute key messages in the identified primary languages during emergency situations (natural disasters, widespread utility service outages, etc.).

- E. **Service Requests.** Interpretation and translation requests should be submitted to the applicable department in advance, when possible, to allow adequate time for language assistance services to be arranged. Departments must document and send the requests to the Personnel Officer. If departmental staff is unable to fulfill the requests utilizing in-house staff, the City administration and Personnel Officer will assist the department in securing interpretation or translation services through city procurement procedures.
- F. **Quality of Language Access Services.** The City will ensure that reasonable steps are taken to ensure all staff or contracted personnel who serve as translators or interpreters are competent to do so.

## VII. LANGUAGE ACCESS COMPLAINT PROCESS

- A. **Complaints.** Any LEP individual has a right to file a complaint against the agency where they believe that the agency did not provide necessary LEP services as appropriate. These complaints include those available under Title VI of the Civil Rights Act of 1964.
- B. **Reporting.** All complaints, alleging a violation under Title VI will be referred to the Personnel Officer. Complaints must be filed in writing using the Title VI Discrimination Complaint Form (Appendix A). The Personnel Officer and City Administration will take appropriate steps to resolve all complaints in accordance with the agency's discrimination complaint procedures.
- C. **Complaint Log.** The Personnel Officer will maintain a ledger tracking all complaints and their resolution. The ledger will include the following items:
  - a. Source of complaint
  - b. LEP request including relevant contact information
  - c. Nature of complaint request
  - d. Date complaint/request received
  - e. Date complaint/request resolved
  - f. Manner of resolution
  - g. Comments

## VIII. DOCUMENTATION

- A. **Records.** The City is responsible for maintaining a ledger of all requests for service, complaints, and resolutions. The Personnel Officer will maintain all documents and store the files based on the fiscal year in which the service or complaint occurred.

